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Attorneys for Defendant
ABSOLUTE DENTAL &
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PAULINA KLEIP-SOTELO, an Individual,

Plaintiff,

vs.

Case No. 2:20-cv-00021-KJD-DJA

ABSOLUTE DENTAL &
ORTHODONTICS PRADA, PLLC., a
Domestic Professional Limited Liability
Company, DOES I -X; ROE
CORPORATIONS I -X.,

Defendant.

**STIPULATION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT
(FIRST REQUEST)**

Pursuant to LR IA 6-1 and LR 7-1, Plaintiff, PAULINA KLEIP-SOTELO, and Defendant ABSOLUTE DENTAL & ORTHODONTICS PRADA, PLLC., through their respective attorneys of record, hereby stipulate and agree that Defendant has until April 30, 2020 to respond to the Complaint. Defendant was served with a copy of the Summons and Complaint on January 9, 2020. However, Defendant did not receive notice that it had been served until April 9, 2020.¹ Good cause exists to grant this extension because Defendant requires time to investigate and prepare its response to the Complaint. If the requested extension is granted, Defendant will file its response on or before April

¹ Defendant certainly intends to defend itself in this case and the lack of notice of service is sufficient grounds to warrant additional time to respond to the complaint pursuant to LR IA 6-1(a). *See e.g., Las Vegas Sands Corp. v. First Cagayan Leisure & Resort Corp.*, No. 214CV424JCMNJK, 2016 WL 447481, at *2 (D. Nev. Feb. 3, 2016).

30, 2020. This is the first request for an extension made by the parties and the parties make this request in good faith and not for the purpose of delay.

IT IS SO STIPULATED.

Dated: April 13, 2020

Respectfully submitted,

/s/ Jenny L. Foley

JENNY L. FOLEY, PH.D., ESQ.
MARTA D. KURSHUMOVA, ESQ.
HKM EMPLOYMENT ATTORNEYS LLP

Attorney for Plaintiff
PAULINA KLEIP-SOTELO

Dated: April 13, 2020

Respectfully submitted,

/s/ Amy L. Thompson

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AMY L. THOMPSON, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant
ABSOLUTE DENTAL & ORTHODONTICS
PRADA, PLLC.

IT IS SO ORDERED.

DATED: April 14, 2020



THE HONORABLE U.S. MAGISTRATE
JUDGE DANIEL J. ALBREGTS

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